

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

OLACHI MEZU-NDUBUISI, an Individual	)	
	)	
Plaintiff,	)	Case No.: 24-cv-6387-EAW
vs.	)	
	)	
UNIVERSITY OF ROCHESTER, et.al.	)	
	)	
	)	
Defendants.	)	

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**PLAINTIFF’S NOTICE OF MOTION TO SEAL EXHIBIT AG IN THE  
PLAINTIFF’S MEMORANDUM IN SUPPORT OF RENEWED MOTION FOR A  
PRELIMINARY INJUNCTION**

Plaintiff, respectfully seeks leave of the court to file this motion to seal Exhibit AG - Dr. Mezu-Ndubuisi’s September 14, 2024 response to Medical Executive Committee (“MEC”).

PLEASE TAKE NOTICE that upon the Declaration of C. Valerie Ibe, dated November 24, 2024, attached herein, and memorandum in support of plaintiff’s motion to seal Exhibit AG submitted in support of her memorandum in support of renewed motion for a preliminary injunction, plaintiff, Dr. Olachi Mezu-Ndubuisi will move this Court, at a date and time to be set by the Court, at the Federal Building and Courthouse, 100 State Street, Rochester, New York 14614, before the Honorable Elizabeth A. Wolford, Chief United States District Judge, for an Order directing the Clerk of this Court to file this exhibit under seal.

This is filed pursuant to Rule 5.3 of the Local Rules of Civil Procedure of the United States District Court for the Western District of New York and the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

As described in the accompanying declaration of plaintiff's attorney, C. Valerie Ibe, and memorandum in support of plaintiff's motion to file Exhibit AG under seal, good cause exists for this filing as the exhibit sought to be sealed contains private, sensitive, privileged, confidential, medical data of patients and treatment information and treating professional. They are extremely relevant to the defendants' Fair Hearing Process which is the subject matter of the plaintiff's renewed motion for preliminary injunction. Placing this document in the public record will not serve the public interest.

This application is accompanied by a supporting memorandum, declaration of plaintiff's attorney, C. Valerie Ibe and a proposed order.

Dated: November 24, 2024

Respectfully Submitted,

\_\_\_\_\_/s/C. Valerie Ibe, Esq. \_\_\_\_\_

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